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February 28, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Hotwire Communications, Ltd. Certification of CPNI Filing
EB-06-TC-060, WC Docket No. 06-36**

Dear Ms. Dortch:

Hotwire Communications, Ltd. ("Hotwire"), pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006¹ and the Commission's rules requiring that all telecommunications carriers protect the privacy of customer proprietary network information ("CPNI"),² submits its Compliance Statement and Certificate. Protecting CPNI is an important obligation for all telecommunications carriers and Hotwire takes its responsibility to assure the confidentiality of its customers' CPNI very seriously.

As requested by the Public Notice, the undersigned, as an officer of Hotwire, certifies based upon personal knowledge that the following Compliance Statement accurately describes the operational procedures and policies implemented by Hotwire to ensure the privacy of its customers' CPNI in compliance with Commission's CPNI rules.

¹ *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

² 47 C.F.R. §64.2001, *et seq.*

STATEMENT OF COMPLIANCE WITH CPNI RULES

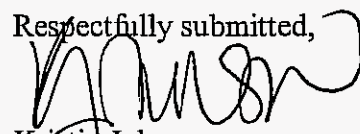
Hotwire has elected to utilize or provide CPNI only for purposes that are permissible without customer approval in accordance with 47 C.F.R. § 64.2005. Thus, Hotwire does not use CPNI in a manner that requires customer approval and is not required to implement a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI. As permitted by the CPNI rules, Hotwire uses CPNI (1) to initiate, render, and bill and collect for telecommunications services rendered; (2) to protect rights or property of Hotwire, other users or other carriers from unlawful use; (3) to provide any inbound telemarketing or administrative services for the duration of a call; (4) for the purpose of providing customer premises equipment and protocol conversion; and (5) in order to provision inside wiring, maintenance and repair services.

Hotwire does not share, sell, lease, disclose or otherwise provide access to CPNI to any unrelated third parties for the purpose of marketing any services. Sharing, selling, leasing or otherwise providing CPNI to any unrelated third parties is strictly prohibited by Hotwire. Hotwire may disclose CPNI to its agents and independent contractors in order for those agents or independent contractors to provide services to Hotwire's customers. All such agents or independent contractors must execute a contract with Hotwire that includes provisions protecting the confidentiality of Hotwire's customer information.

Hotwire has implemented processes and procedures to train its personnel as to when they are and are not permitted to use CPNI. For instance, all Hotwire employees are required to abide by Hotwire's Confidentiality Agreement, which must be reviewed and signed by all employees as part of the hiring process. Among other things, the Confidentiality Agreement requires employees to maintain the confidentiality of all information that is obtained as result of their employment by Hotwire. Employees who violate Hotwire's Confidentiality Agreement will be subject to discipline, including possible termination. Although Hotwire has never received any complaint from a customer that it has misused CPNI in any fashion, in an abundance of caution and in light of the recent reports about the availability on the Internet of sensitive, personal subscriber information to third parties, Hotwire currently is auditing all of its CPNI policies and procedures and, if necessary, will implement a more comprehensive plan for protecting its customers' confidential information.

Hotwire does not currently use CPNI to engage in any large-scale coordinated sales and marketing campaigns. A significant amount of Hotwire's marketing is focused on new customers and/or based upon marketing services to a group of customers at a specific location without using CPNI to conduct such marketing. All outbound marketing campaigns are supervised by Hotwire's Marketing Manager, who maintains records of such supervision.

Respectfully submitted,



Kristin Johnson
General Manager
Hotwire Communications, Ltd.

cc: Bryon McKoy via e-mail: byron.mccoy@fcc.gov
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